

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
	)	Civil Action No.
\$50,060.00 IN UNITED STATES	)	
CURRENCY SEIZED IN FAIRHAVEN,	)	
MASSACHUSETTS ON MAY 3, 2022,	)	
	)	
Defendant <i>in Rem</i> .	)	

**VERIFIED COMPLAINT FOR FORFEITURE *IN REM***

The United States of America, by its attorney, Joshua S. Levy, United States Attorney for the District of Massachusetts, in a civil action of forfeiture pursuant to 21 U.S.C. § 881(a)(6) alleges that:

1. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345 and 1355. Venue is appropriate pursuant to 28 U.S.C. § 1395.
2. The defendant property consists of the following:
  - a. \$50,060.00 in United States currency seized in Fairhaven, Massachusetts on May 3, 2022 (the “Currency”).
3. As detailed in the affidavit of Louis J. Tenore, Special Agent of the United States Drug Enforcement Administration attached as Exhibit A and incorporated herein by reference, the Currency is subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(6) because it represents moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of 21 U.S.C. §§ 841 and/or 846, proceeds traceable to such an exchange, and/or

moneys, negotiable instruments, and securities used or intended to be used to facilitate such a violation.

WHEREFORE, the United States of America respectfully requests:

1. That a Warrant and Monition, in the form submitted herewith, be issued to the United States Marshals Service, commanding it to retain custody of the Currency and to give notice to all interested parties to appear and show cause why the forfeiture should not be decreed;
2. That judgement of forfeiture be decreed against the Currency;
3. That thereafter, the Currency be disposed of according to law; and
4. For costs and all other relief to which the United States may be entitled.

Respectfully submitted,

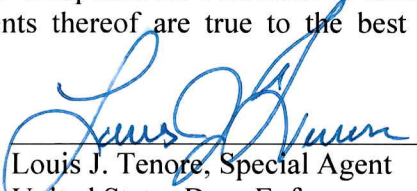
JOSHUA S. LEVY  
United States Attorney,

By: /s/ Matthew M. Lyons  
MATTHEW M. LYONS  
Assistant United States Attorney  
United States Attorney's Office  
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Boston, MA 02210  
(617) 748-3100  
matthew.lyons@usdoj.gov

Dated: January 16, 2025

**Verification**

I, Louis J. Tenore, Special Agent for the United States Drug Enforcement Administration, state that I have read the foregoing Verified Complaint for Forfeiture *in Rem*, and the Affidavit, attached as Exhibit A, and that the contents thereof are true to the best of my knowledge, information, and belief.



Louis J. Tenore, Special Agent

United States Drug Enforcement Administration

Dated: January 16, 2025